

# **Exhibit A**

**From:** [BOSCO, Veronica](#)  
**To:** [ccoslett@bm.net](#); [GZelcs@KoreinTillery.com](#); [Noss, Walter](#); [Lv, Kate](#); [Clerkin, Stephanie](#); [jsteinmetz@koreintillery.com](#); [Izaak Earnhardt](#); [Mark C. Mao](#); [Philip Korologos](#); [Jordan Elias](#); [Ted Maya](#); [Stuart Davidson](#); [MCamozzi@rgrdlaw.com](#); [MAngotti@rgrdlaw.com](#); [Serina Vash](#); [John Thorne](#); [Eric Maier](#); [Goodnow, Christopher C.](#); [jrubin@moginrubin.com](#); [oliver@moginrubin.com](#); [MRParalegal@moginrubin.com](#); [kmbaxter-kauf@locklaw.com](#); [pmarkert@cerallp.com](#)  
**Cc:** [SESSIONS, Justina \(JKS\)](#); [MAHR, Eric \(EJM\)](#); [ELMER, Julie \(JSE\)](#); [EWALT, Andrew \(AJE\)](#); [RYBNICEK, Jan \(JRYB\)](#); [MCCALLUM, Robert](#); [KAPLIN, Lauren](#); [BAYOUMI, Jeanette](#); [EGOUL, Vadim](#); [MURRAY, Sean](#); [STEYL, Matthew](#); [SVENSON, Ross](#); [SYRMOS, Alexia](#); [ZWEIFACH, Ben](#); [BASSETT, Morgan](#); [CERICOLA, Pamela](#); [FAULKNER, Anna](#); [Reiser, Craig M.](#); [Boisvert, Caroline P.](#); [Bitton, Daniel S.](#); [Pearl, David](#); [Justus, Bradley](#)  
**Subject:** In re Google Digital Advertising - Next steps  
**Date:** Wednesday, March 6, 2024 4:13:58 PM

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**Caution:External Email**

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Counsel,

Consistent with the Court's prior orders following dismissal rulings in the MDL, we would like to agree on and propose to the Court a process to streamline matters following the Court's ruling on Google's motions to dismiss. We'd like to avoid any ambiguity or confusion about deadlines and what claims remain in the case. To that end, we propose the following for all remaining plaintiffs other than Inform and Daily Mail. Craig will follow up separately regarding Daily Mail.

1. By Friday, March 15, Plaintiffs will file conforming amended complaints, which clarify the narrowed scope of their claims based on Judge Castel's rulings dismissing certain claims.
2. To the extent that Plaintiffs still intend to advance state-law antitrust claims, the parties will enter into a stipulation similar to that between the States and Google, i.e., agreeing that state antitrust claims are deemed dismissed to the same extent as federal claims.
3. 15 days following agreement on the stipulation and/or conforming amendments (whichever is later), Google may file letter briefs seeking to dismiss Plaintiffs' state-law claims.
4. Google's deadline to answer a complaint will be 30 days from the latest of 1 or 2 or, if Google requests leave to move to dismiss state-law claims, 30 days from resolution of such request or subsequent motion.

Please let us know by Friday, March 8 if Plaintiffs are amenable to this proposal. If so, we will draft a proposed stipulation and order outlining the above.

Kind regards,  
Veronica

**Veronica M. Bosco**  
Senior Associate

**Freshfields Bruckhaus Deringer US LLP**  
3 World Trade Center  
175 Greenwich Street, 51<sup>st</sup> Floor  
New York, NY 10007  
T +1 646-440-1863 | M +1 929-266-7982  
[Veronica.Bosco@freshfields.com](mailto:Veronica.Bosco@freshfields.com)

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